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*Attorneys for General Motors LLC*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:	: Chapter 11
	:
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:
f/k/a General Motors Corp., <i>et al.</i> ,	: Case No.: 09-50026 (MG)
	:
Debtors.	: (Jointly Administered)
	:
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**GENERAL MOTORS LLC’S COUNTER-DESIGNATION OF  
ADDITIONAL ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL**

Pursuant to Rule 8009 of the Federal Rules of Bankruptcy Procedure, General Motors LLC (“**New GM**”), as appellee, submits this counter-designation of additional items to be included in the record on appeal in connection with the appeal of the *Memorandum Opinion and Order Enforcing Provisions of Sale Order with Respect to Punitive Damage Claims Made by Kimberly and Tammy McCall, Both Individually and as Representatives*, dated July 10, 2019 [ECF No. 14554] (“**McCall Opinion**”).

**COUNTER-DESIGNATION OF RECORD**

In addition to the items (including any exhibit, annex, appendix or addendum thereto) designated by Appellants in their *Record on Appeal and Statement of Issues on Appeal*, dated August 7, 2019 [ECF No. 14595], New GM submits the following designation of additional items to be included in the record on appeal of the McCall Opinion (including any exhibit, annex, appendix or addendum thereto):

<b><u>Item No.</u></b>	<b><u>Date Filed</u></b>	<b><u>Description</u></b>
1.	3/15/2019	Appellee's Brief filed by FCA US LLC in <i>In re Old Carco LLC</i> , 18-cv-11290-AJN (S.D.N.Y.) [ECF No. 18].

Dated: New York, New York  
August 21, 2019

Respectfully submitted,

/s/ Arthur Steinberg  
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